

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

FILED  
IN CLERKS OFFICE

2004 APR 29 P 12:36

U.S. DISTRICT COURT  
DISTRICT OF MASS.

JOCELYN GEORGES,

Plaintiff,

v.

PARTNERS HEALTHCARE  
SYSTEM, INC., a/k/a  
MASSACHUSETTS GENERAL  
HOSPITAL,

Defendants.

C.A. No. 03-12553-REK

PARTIES' JOINT STATEMENT PURSUANT TO LOCAL RULE 16.1(D)

Pursuant to the Notice of Scheduling Conference dated April 5, 2004 and L.R.D.Mass. 16.1, Plaintiff Jocelyn Georges and Defendant Massachusetts General Hospital ("the Parties") respectfully submits the following:

I. Proposed Discovery Schedule

- A. The Parties anticipate complying with their disclosure obligations pursuant to Fed.R.Civ.P. 26(a)(1) prior to the conference on May 6, 2004.
- B. The Parties believe four months, to September 7, 2004, will be sufficient time to complete fact discovery.
- C. The Parties do not anticipate expert discovery, and therefore sees no basis for phased discovery.

II. Motion Schedule

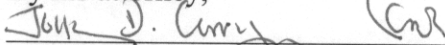
The Defendant Massachusetts General Hospital anticipates filing a motion for summary judgment on or before October 8, 2004.

III. Certification

Filed independently by the Parties.

JOCELYN GEORGES

By his attorney,

 (Cnr)

John D. Corrigan – BBO# 100460

O'MALLEY AND HARVEY, LLP

Two Oliver Street, 9<sup>th</sup> Floor

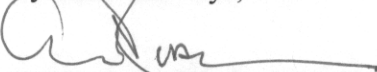
Boston, MA 02109-4908

(617) 357-5544

PARTNERS HEATHCARE SYSTEM, INC., a/k/a

MASSACHUSETTS GENERAL HOSPITAL

By their attorneys,



Christine M. Roach – BBO No. 421630

ROACH & CARDENTER, P.C.

24 School Street

Boston, MA 02108

(617) 720-1800

DATED: April 29, 2004

Certificate of Service

I, Christine M. Roach, hereby certify that I have served a copy of the above pleading on the opposing party by this day mailing a copy of same regular mail to counsel of record.

DATED: April 29, 2004



Christine M. Roach

Christine M. Roach  
M. Ellen Carpenter

Scott P. Lopez  
*of Counsel*



ROACH & CARPENTER, P.C.

2004 APR 29 10:36  
24 School Street  
Boston, Massachusetts 02108  
(tel) 617.720.1800  
(fax) 617.720.0720  
(e-mail) lawyer@rc-law.com

BY HAND

April 29, 2004

Karen Folan, Docket Clerk  
Hon. Robert E. Keeton  
United States District Court  
District of Massachusetts  
John Joseph Moakley Federal Courthouse  
1 Courthouse Way  
Boston, MA 02210

RE: Georges v. Partners HealthCare System, Inc., et al.  
Civil Action No. 03-12553-REK

Dear Ms. Folan:

Enclosed for filing in the above matter, please find the following:

- Parties' Joint Statement Pursuant to Local Rule 16.1(D); and
- Defendant's Certification Pursuant to Fed.R.Civ.P. 16(D)(3).

Thank you for your attention to this matter.

Very truly yours,

A handwritten signature in cursive script, appearing to read 'Christine M. Roach', is written over the typed name.

Christine M. Roach

encl.

cc: John D. Corrigan, Esq. (via regular mail, w/encl.)